UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	v
MAXON HYUNDAI MAZDA, et al.,	- X : :
Plaintiffs,	:
- against -	: No. 13 CV 2680 (AJN) (RLE)
CARFAX, INC., a Pennsylvania corporation,	: : NOTICE OF MOTION TO : COMPEL
Defendant.	:
	: -X

PLEASE TAKE NOTICE that, upon the Declarations of Julie A. Ortmeier, dated May 6, 2015, of Annica Sunner Bianco, dated May 8, 2015, and of Dr. John Hayes, dated May 8, 2015, the exhibits attached to them, and the accompanying brief, Defendant Carfax, Inc. respectfully moves this Court for an Order, pursuant to Federal Rules of Civil Procedure 37(a), compelling Plaintiffs to produce the requested discovery in this action.

Dated: May 8, 2015

NIXON PEABODY LLP

By: /s/ Christopher M. Mason

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Attorneys for Defendant

Carfax, Inc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MAXON HYUNDAI MAZDA, et al.,

Plaintiffs,

Civil Action No.

- VS -

13-CIV-2680-AJN-RLE

CARFAX, INC.,

Defendant.

CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2015, I served Defendant Carfax, Inc. 's: 1) Notice of Motion to Compel; 2) Declaration of Annica Sunner Bianco with Exhibits A-G attached thereto; 3) Declaration of Julie A. Ortmeier with Exhibits A-C attached thereto; 3) Declaration of Dr. John Hayes with Exhibits A-F attached thereto; and 4) Brief in Support of Defendant's Motion to Compel with the Clerk of Court for the United States District Southern District of New York, using the CM/ECF system of the Court, which sent notification of such filing to the following:

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Dated: May 8, 2015 /s/ Christopher Mason
Christopher Mason